

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

**FIRST SET OF INTERROGATORIES OF TIME INC.
TO UNITED STATES POSTAL SERVICE
WITNESS WILLIAMS (TI-USPS-T1-1-5)
(December 22, 2011)**

Pursuant to sections 25, 26 and 27 of the Rules of Practice and to Order No. 1027 (issued December 7, 2011), Time Inc. directs the following interrogatories to Postal Service witness Williams (USPS-T-1).

If witness Williams is incapable of providing an answer to any question, it is requested that an answer be provided by the Postal Service as an institution or by another person capable of providing an answer.

Respectfully submitted,

s/
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**FIRST SET OF INTERROGATORIES OF TIME INC. TO WITNESS
WILLIAMS (USPS-T-1)**

TI-USPS-T1-1. Your testimony, as well as the Postal Service's December 15 notice in the Federal Register, describes the service standards that will apply to First Class and Periodicals mail if the network changes you propose are implemented. In particular, you confirm the intention to continue with a one-day (overnight) service standard for properly presorted Periodicals flats that are entered at the destinating SCF prior to the critical entry time (CET).

Please explain how the Postal Service intends to measure the extent to which service standards are being met after the changes proposed in this docket have been implemented. In particular, please answer the following:

- a. Will the Postal Service measure and publicly report the volumes of (i) First Class and (ii) Periodicals mail that qualify for overnight delivery under the proposed new standards?
- b. Will the Postal Service measure and publicly report the volumes of (i) First Class and (ii) Periodicals mail that both qualify for overnight delivery under the proposed new standards and actually achieve overnight delivery?
- c. If the answer to any part of questions a and b above is Yes, to what level of detail will such volumes be measured and reported?

TI-USPS-T1-2. Regarding the measurements of service performance for Periodicals mail, please confirm the following, or explain if unable to confirm.

- a. During FY2011, the reports filed by the Postal Service were based on data collected by (1) the not-for-profit Red Tag News Publications Association; and (2) Time Inc. through the Deltrak system.
- b. Starting in FY2012, the Postal Service will no longer make use of the above mentioned data systems for the purpose of service performance measurement.

TI-USPS-T1-3. Please explain how the Postal Service intends to monitor Periodicals service performance during FY2012 and in future years. In particular:

- a. Does the Postal Service in the future plan to rely exclusively on scans of

intelligent mail barcodes (IMB) for measurement of Periodicals service performance? If No, what other methods will be used?

- b. Please describe the role of IBM and, if applicable, any other outside contractor involved in the measurement of Periodicals service performance, either currently or with respect to the future.
- c. Please provide a copy of all relevant statements of work (SOW) under which IBM and, if applicable, any other contractor is helping to measure Periodicals service performance, or to develop methodologies for such measurements, either currently or with respect to the future.
- d. Both Deltrak and Red Tag capture in-home arrival dates for measurement of service performance. Do the Postal Service's plans for continued monitoring of Periodicals service performance include in-home arrival dates? If yes, how will such data be collected, and how comparable will the amount of such data collected be to that collected by Deltrak and Red Tag?

TI-USPS-T1-4. Please confirm that when the Postal Service consolidates two mail processing facilities so that facility A takes over the functions previously performed by facility B, then facility A becomes the destinating SCF for all zones whose destinating SCF previously was facility B, and all delivery standards for mail entered at B are transferred to standards for the same mail entered at A.

TI-USPS-T1-5. Given the likelihood that some mailers who enter mail at destinating SCFs may modify their mailing practices in order to meet the revised critical dispatch times described in your testimony, what is your and the Postal Service's best estimate of the volumes of (i) First Class; and (ii) Periodicals mail that will qualify for overnight delivery after the proposed changes have been implemented?